

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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Target Corporation, a Minnesota  
corporation,

Court File No. 0:19-CV-2916

Plaintiff,

v.

**DEFENDANTS' CROSS-MOTION  
FOR SUMMARY JUDGMENT**

ACE American Insurance Company,  
A Pennsylvania corporation and  
ACE Property & Casualty Insurance  
Co., a Pennsylvania corporation,

Defendants.

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Defendants ACE American Insurance Company and ACE Property & Casualty Insurance Company, by and through counsel, hereby move this Court for summary judgment pursuant to Federal Rule of Civil Procedure 56(a). This motion is based upon all pleadings, records and proceedings herein, and the Memorandum in Support of Defendants' Cross-Motion for Summary Judgment and supporting documents thereto, and the arguments of counsel at the anticipated hearing. Defendants make this motion on the grounds that the insurance policies at issue do not provide coverage for Plaintiff's claimed damages, and Defendants are entitled to judgment as a matter of law.

Respectfully submitted,

Dated: June 24, 2020

/s/ Charles E. Spevacek

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